

LOCAL BANKRUPTCY FORM 9013-4

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

PENN CENTER HARRISBURG, LP

CHAPTER 11

CASE NO. 1-23-bk-02771-HWV

Debtor(s)

ADVERSARY NO. ap-
(if applicable)

Plaintiff(s)/Movant(s)

vs.

Nature of Proceeding: Motion for

Use of Cash Collateral

Defendant(s)/Respondent(s)

Document #: 7

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

The major asset of the Debtor, which is real estate, has been sold and the parties are waiting for approval of the Disclosure Statement and Plan. The secured creditor and the debtor have agreed on the use of cash collateral which is minimal. They have agreed that cash collateral use can continue under the prior order until the next hearing. No hearing is believed to be necessary.

It is requested that the hearing be continued to the same date as the hearing on the Disclosure Statement on 8/20/2024 at 09:30 AM.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: July 16, 2024

/s/ Robert E. Chernicoff

Attorney for Debtor

Name: Robert E. Chernicoff, Esquire

Phone Number: 717-238-6570

¹ No alterations or interlineations of this document are permitted.